

REMARKS/ARGUMENTS

Favorable reconsideration of this application in view of the present amendments and in light of the following discussion is respectfully requested.

Claims 31-54 and 56-61 are pending. Claims 31, 32, 37-38, 47, and 57 are amended, and Claim 61 is newly added. No new matter is introduced.<sup>1</sup>

In the outstanding Office Action, Claims 31-36 and 38-43, 47-48, 50-54 and 56-60 were rejected under 35 U.S.C. § 102(e) as being anticipated by England (U.S. Patent No. 6,144,991, hereafter "England"); Claims 37, 44, 46 and 49 were rejected under 35 U.S.C. § 103(a) as being unpatentable over England in view of Tang (U.S. Patent No. 5,793,365, hereafter "Tang"); Claim 45 was rejected under 35 U.S.C. § 103(a) as being unpatentable over England in view of Kakuta (U.S. Patent No. 6,714,965, hereafter "Kakuta").

Applicants acknowledge with appreciation the courtesy of Examiner Shaw to interview this case with Applicants' representatives on June 11, 2008, during which time the issues in the outstanding Office Action were discussed as substantially summarized hereinafter, and also in the Interview Summary, which the Examiner has made of record. In particular, the rejection of Claim 31 as being anticipated by England was discussed, as well as the function of the management unit and client program. During the interview Examiner Shaw recommended further amending the claims in order to advance prosecution, which Applicants have done.

Claim 31, as amended, recites a system for communicating over an open network that includes a management unit configured to distribute a plurality of data from a database to a plurality of remote users, and also includes:

a first terminal associated with a first user and  
configured to access a first information site, *said first*

---

<sup>1</sup> Non-limiting support can be found for the amended claims and the new claim at least at page 3, lines 14-17; page 8, lines 10-35; page 16, line 30-page 17, line 11; page 4, lines 15-20; and in the claims as originally filed.

*information site being stored independently from the management unit, and configured to acquire a client program from the management unit;*

*...said management unit is configured to access the database and determine a collection of related information sites containing related information associated with the internet address of the first information site;*

*said management unit is configured to identify a second user at a second terminal, having the client program, said second user accessing at least one other related information site of the collection of said related information sites containing related information associated with the internet address of the first information site and said management unit is configured to receive an IP address of the second terminal... (Emphasis added.)*

Turning to the applied reference, England describes a software system which allows a guide/specialist to interact with a client on a real-time, interactive basis over the World Wide Web.<sup>2</sup> England further describes that the system includes a guide system 1206, a piper server 502, a client system 1208, and an HTTP server 1204.<sup>3</sup> England goes on to describe that a client is a *user* of a computer who sends messages to the guide, and receives messages from the guide, and England describes that the guide is a *user* of a computer who leads one or more clients by sending messages to clients and/or propagating web pages and/or internet resources to the clients.<sup>4</sup> To perform the respective task, England describes that the client's web browser is loaded with a presentation frame set 902 selected *by the guide*, and the guide's web browser is a "special purpose browser" which contains a preview frame 1008 that the guide can used to find a particular web page and a remotely displayable frame 1010 where the guide can see everything that the client sees.<sup>5</sup> Lastly, England describes that *the guide initiates instructions*, and that the instructions are communicated to a piper server 502,

---

<sup>2</sup> See the Abstract of England.

<sup>3</sup> England at column 14, line 65-column 15, line 25.

<sup>4</sup> Id. at column 10, lines 35-55.

<sup>5</sup> Id. at columns 12-13.

and that the piper server 502 forwards the instructions to all connected client systems to their client-side components.<sup>6</sup>

The outstanding Office Action appears to associate the piper server 502 of England with the management unit recited in amended Claim 31.<sup>7</sup> However, in amended Claim 31 the management system is configured to determine a collection of related information sites containing related information associated with the internet address of the first information site. In contrast, the piper server 502 described in England functions merely as a conduit between the user known as the guide and the user known as the client. It is the guide in England that determines what pages will be displayed to the client, not the piper server 502. Therefore, the piper server 502 of England could not be the management unit described in amended Claim 31 because the piper server 502 is not configured to determine a collection of related information sites.

Moreover, amended Claim 31 recites features not disclosed in England. Namely, that “said first information site is maintained independently from the management unit” and that “the management unit is configured to identify a second user...said second user accessing at least one *other* related information site.” (Emphasis added.) Thus, it is submitted that England fails to disclose every element recited in amended Claim 31, and that amended Claim 31 is in condition for allowance. It is also submitted that Claims 32-36, 38-43 and 61 are also in condition for allowance for at least the same reasons as amended Claim 31. Accordingly, it is respectfully requested that the rejection under 35 U.S.C. § 102(e) of amended Claims 31-36, 38-43 and 61 be withdrawn.

Though of a different statutory class than amended Claim 31, amended Claim 47 recites substantially the same features, and is therefore in condition for allowance for

---

<sup>6</sup> England at Col. 26, lines 20 - 30.

<sup>7</sup> Outstanding Office Action at page 3, item 6a.

substantially the same reasons. Furthermore, Claims 48, 50-54 and 56-60 are also in condition for allowance for at least the same reasons as amended Claim 47, on which they directly or indirectly depend. Therefore, it is respectfully requested that the rejection under 35 U.S.C. § 102(e) of Claims 47-48, 50-54 and 56-60 be withdrawn.

Regarding the rejection of Claims 37, 44 and 46 as being unpatentable over England in view of Tang, Claims 37, 44 and 46 depend from amended Claim 31. As discussed above, England fails to disclose every element recited in amended Claim 31, and consequently England also fails to disclose every element recited in amended Claims 37, 44 and 46. Moreover, Tang does not cure the above-identified deficiencies in England. Accordingly, no combination of England and Tang describes every element recited in Claims 37, 44 and 46, and it is submitted that Claims 37, 44 and 46 are in condition for allowance. Therefore, it is respectfully requested that the rejection of Claims 37, 44 and 46 under 35 U.S.C. § 103(a) be withdrawn.

Claim 45 was rejected as being unpatentable over England in view of Kakuta. As discussed above, England does not disclose every element recited in amended Claim 31, and as Claim 45 depends from amended Claim 31, England does not disclose every element recited in Claim 45. Further, Kakuta fails to cure the deficiencies in England noted above. Accordingly, it is submitted that Claim 45 is in condition for allowance, and it is respectfully requested that the rejection of Claim 45 under 35 U.S.C. § 103(a) be withdrawn.

Lastly, Claim 49 was rejected under 35 U.S.C. § 103(a) as being unpatentable over England in view of Tang. As discussed above, England does not disclose every element recited in Claim 47, and consequently England does not disclose every element recited in Claim 49, which depends from Claim 47. Further, Tang does not cure these deficiencies in England. Therefore, it is submitted that Claim 49 is in condition for allowance, and it is respectfully requested that the rejection under 35 U.S.C. § 103(a) of Claim 49 be withdrawn.

For the reasons discussed above, no further issues are believed to be outstanding in the present application, and the present application is believed to be in condition for formal allowance. Therefore, a Notice of Allowance for Claims 31-54 and 56-60 is earnestly solicited.

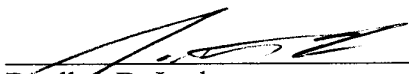
Should the Examiner deem that any further action is necessary to place this application in even better form for allowance, the Examiner is encouraged to contact Applicants' undersigned representative at the below listed telephone number.

Customer Number  
**22850**

Tel: (703) 413-3000  
Fax: (703) 413 -2220  
(OSMMN 08/07)

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,  
MAIER & NEUSTADT, P.C.

  
Bradley D. Lytle  
Attorney of Record  
Registration No. 40,073

I:\ATTY\AMA\21\S\213854US\213854US-AM.doc

Scott A. McKenna  
Registration No. 40,073